

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

DELICIA VIDAL & ENRIQUE VIDAL, JR.,
individually and as Co-Personal Representatives
of the Estate of ENRIQUE VIDAL,

Plaintiffs,

vs.

Case No. 1:13-cv-01014 WJ/KBM

UNITED STATES OF AMERICA,

Defendant.

STIPULATED PROTECTIVE ORDER FOR CONFIDENTIAL DOCUMENTS

This matter came before the Court on the stipulation of the parties that the confidentiality of certain documents produced by Plaintiffs Delicia Vidal and Enrique Vidal, Jr., individually and as Co-Personal Representatives of the Estate of Enrique Vidal, should be maintained in the referenced action (“the Lawsuit”);

The Court finds that good cause exists for entering this Order.

The Court orders as follows:

1. Defendant has requested and Plaintiffs have produced a redacted copy of the Settlement Agreement reached in *Vidal, et al. v. Presbyterian Hospital, et al.*, Cause No. D-202-CV-2012-01488, in the Second Judicial District, State of New Mexico (“Confidential Documents”). Confidential Documents produced by Plaintiffs in this action shall be utilized by Defendant and the Plaintiffs only for purposes related to the Lawsuit.

2. The attorneys for the parties shall only distribute or disclose the Confidential Documents and the information contained in the Confidential Documents to the following persons: (1) employees and partners of the parties’ respective law firms/employer who have a

work-related need to know the contents of the Confidential Documents for the purpose of the Lawsuit; and (2) the Court. The parties shall require any persons in category 1 to whom they disclose the Confidential Documents not to disclose any of the Confidential Documents to any third party.

3. The parties will not permit any person not identified in Paragraph 2, above, to inspect, examine, copy or replicate any of the Confidential Documents at any time.

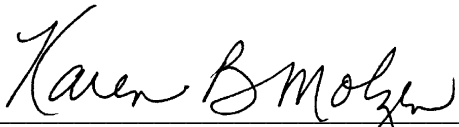
4. The attorneys for the parties agree that they and their employees will utilize the Confidential Documents and the information contained in the Confidential Documents only for purposes related to the Lawsuit, and that they shall otherwise maintain the confidentiality of the Confidential Documents and the information contained in the Confidential Documents.

5. If the Confidential Documents are used in connection with any deposition, they will not be attached as exhibits to the deposition transcript.

6. After the termination of the Lawsuit, Plaintiffs and Defendant will destroy all copies of the Confidential Documents that they provided to persons identified in Paragraph 2, and Defendant will destroy all copies of the Confidential Documents it received.

7. In the event that Plaintiffs or Defendant intend to submit any of the Confidential Documents to the Court in connection with any motion or hearing, Plaintiffs or the Defendant shall provide the Confidential Documents to the Court under separate cover under seal. Confidential Documents shall not be attached to any pleading or motion filed with the Court Clerk.

IT IS SO ORDERED.



HONORABLE KAREN B. MOLZEN
UNITED STATES CHIEF MAGISTRATE JUDGE

Submitted by:

/s/ Louren Oliveros 12/22/14

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